

1 Theodore J. Angelis (pro hac vice pending)
theo.angelis@klgates.com
2 Jay C. Chiu
Jay.Chiu@klgates.com
3 K&L GATES LLP
925 Fourth Avenue
4 Suite 2900
Seattle, Washington 98104-1158
5 Telephone: +1 206 623 7580
Facsimile: +1 206 623 7022
6

7 Attorneys for Defendants
Hon Hai Precision Industry Co., Ltd. and
8 Competition Team Technology USA Inc.

9
10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 POLARIS POWERLED
14 TECHNOLOGIES, LLC,

15 Plaintiff,

16 v.

17 VIZIO, INC., et al.,

18 Defendants.
19

Case No. 2:23-cv-03478-GW-PD

**UNOPPOSED MOTION BY
DEFENDANT AND JOINT
STIPULATION FOR
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
COMPLAINT**

20 Defendants Hon Hai Precision Industry Co., Ltd. (“Hon Hai”) and
21 Competition Team Technology USA Inc. (“CTTUS”) (collectively, “Foxconn”),
22 and Plaintiff Polaris PowerLED Technologies, LLC (“Plaintiff”), by their
23 respective counsel of record hereby stipulate as follows:

24 WHEREAS Plaintiff filed its Complaint on May 8, 2023 (Dkt. 1);

25 WHEREAS Plaintiff served the Complaint on CTTUS on May 9, 2023 (Dkt.
26 14);

27 WHEREAS Foxconn’s responsive pleading is currently due on May 30, 2023
28 (Dkt. 14);

506734226.1

1 WHEREAS Foxconn agrees to waive service of the summons and
2 Complaint;

3 WHEREAS, in exchange for the above-named Defendants' waiver of service
4 of process, Plaintiff does not oppose, and has agreed, subject to the Court's
5 approval, to allow Defendants Hon Hai Precision Industry Co., Ltd. and
6 Competition Team Technology USA Inc. a 45-day extension of time to respond in
7 any manner, including by way of answer, motion, or other pleading of any type to
8 Plaintiff's Complaint on or by July 17, 2023;

9 WHEREAS this is the first request for an extension of time to respond to the
10 Complaint;

11 WHEREAS Defendant represents that good cause in supporting the joint
12 stipulation for extension of time exists, because the extension allows Foxconn and
13 its recently-retained litigation counsel adequate time to evaluate the Complaint and
14 formulate their responses;

15 WHEREAS the joint stipulation for extension of time is not interposed for
16 any delay or prejudice to any party;

17 IT IS HEREBY STIPULATED AND AGREED, by and between the
18 undersigned counsel that Foxconn shall respond to the Complaint on or before July
19 17, 2023.

20
21 Dated: May 30, 2023

Respectfully submitted,

22 **K&L GATES LLP**

23
24 By: /s/ Jay C. Chiu

Theodore J. Angelis (pro hac vice
pending)

25 theo.angelis@klgates.com

26 Jay C. Chiu

Jay.Chiu@klgates.com

27 925 Fourth Avenue

Suite 2900

28 Seattle, Washington 98104-1158

Telephone: +1 206 623 7580

506734226.1

Facsimile: +1 206 623 7022

Attorneys for Defendants *Hon Hai Precision Industry Co., Ltd. and Competition Team Technology USA Inc.*

**KRAMER ALBERTI LIM AND
TONKOVICH LLP**

By: /s/ Robert F. Kramer

Robert F. Kramer
David L Alberti
Russell S Tonkovich
Sal Lim
577 Airport Boulevard, Suite 250
Burlingame, CA 94010
650-825-4300
rkramer@krameralberti.com
dalberti@krameralberti.com
rtonkovich@krameralberti.com

Attorneys for Plaintiff *Polaris PowerLED Technologies, LLC*

ATTESTATION

I hereby attest that the other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Jay C. Chiu

Jay C. Chiu